Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the M	Matter of)	
	i Broadcasting Network, Inc.)	CSR-8837-M
Station WEYW-LP, Key West, Florida)	MB Docket No. 13-244
Facility	y ID No. 130765)	
To:	Office of the Secretary Attn: Chief, Media Bureau		

OPPOSITION TO COMPLAINT

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates ("Comcast," or the "Company"), hereby opposes the above-captioned must carry complaint ("Complaint") filed by Bellizzi Broadcasting Network, Inc. ("Bellizzi"), licensee of analog low power television station WEYW-LP (Channel 19), Key West, Florida ("WEYW" or the "Station"). The Complaint seeks carriage on Comcast's Key West, Florida cable system, which serves the community of Key West, as well as other communities located in Monroe County, Florida. The Complaint must be denied because WEYW is not a "qualified" low power television station for must carry purposes with respect to Comcast's Key West cable system.

I. THE STATION IS NOT A "QUALIFIED" LOW POWER TELEVISION STATION

The Communications Act of 1934, as amended (the "Act"), and the Commission's implementing rules require low power television stations ("LPTVs") such as WEYW to meet a specific set of criteria to qualify for must carry status. Of particular relevance here, LPTV

DWT 22865223v1 0107080-000244

¹ See 47 U.S.C. § 534(h)(2); 47 C.F.R. § 76.55(d).

stations have no must carry rights in cable communities already served by a full power broadcast television station. Section 614(h)(2)(F) of the Act clearly provides that LPTV stations are eligible for must carry "only if . . . there is no full power television broadcast station licensed to any community within the county or other political subdivision (of a State) served by the cable system."²

In this case, WEYW is not a "qualified" LPTV station for must carry purposes because there are *two* full power broadcast television stations licensed to Key West, Florida (WGEN-TV and WSBS-TV).³ Key West is located in Monroe County, Florida, as is Comcast's Key West cable system and each of the communities served by that system. Accordingly, WEYW plainly does not meet the requirements of a "qualified" LPTV under Section 614(h)(2)(F) of the Act and Section 76.55(d)(6) of the Commission's rules.

Bellizzi does not dispute the existence of the above-referenced full power stations.⁴ Nor does it identify any basis *under the statute* for the Commission to disregard the local presence of full power stations WGEN-TV and WSBS-TV.⁵ Rather, Bellizzi argues that the Commission should ignore the clear statutory directive that LPTV stations do not qualify for must carry in communities already served by a full power station, on the grounds that full power stations WGEN-TV and WSBS-TV broadcast Spanish-language programming.⁶ That fact, of course, has

² 47 U.S.C. § 534(h)(2)(F) (emphasis added); see also 47 C.F.R. § 76.55(d)(6).

³ See Exhibit 1. Although not essential to the statutory analysis, both of these full power stations are currently carried on Comcast's Key West cable system. See Exhibit 2.

⁴ See, e.g., Complaint at ¶¶ 15-17.

⁵ Because Bellizzi's Complaint fails, as a threshold matter, under Section 614(h)(2)(F), there is no need for the Commission to consider the other factors set forth in Section 614(h)(2), much less the various irrelevant assertions in the declaration that is appended to the Complaint.

⁶ See Complaint at ¶ 5 ("WEYW does not believe that the inquiry should end" with the determination that there are full power licensees in Monroe County.).

no relevance under the governing statute, and to consider it would pile constitutional error on top of statutory error.⁷

Bellizzi's Complaint effectively asks the Commission to waive the requirements mandated by Section 614(h)(2)(F) – which the Commission cannot do. Indeed, the Commission has previously rejected another station's attempt to gain must carry status as a "qualified" LPTV station despite the existence of a local full power broadcast station, stating:

The criteria for a qualified LPTV, as set forth in the Commission's rules, are mandated by Section 614(h)(2) of the 1992 Cable Act. While the Commission may waive its own rules in certain circumstances, it may not waive any part of the statutory definition of a qualified LPTV.⁸

In short, Bellizzi does not meet the statutory criteria that must be met for WEYW to be considered a "qualified" LPTV station for must carry purposes and the Commission must, therefore, reject Bellizzi's arguments and deny the Complaint.

The Supreme Court determined long ago that cable operators are protected by the First Amendment. "There can be no disagreement on an initial premise: Cable programmers and cable operators engage in and transmit speech, and they are entitled to the protection of the speech and press provisions of the First Amendment." Turner Broadcast. Sys., Inc. v. FCC, 512 U.S. 622, 636 (1994) ("Turner P") (citation omitted; emphasis added). The Supreme Court expressly reserved judgment on the constitutionality of must carry for low power television because it "appears to single out certain low-power broadcasters for special benefits on the basis of content." Id. at 644 n.6. Here, Bellizzi presses for a detailed FCC evaluation of content available on low power WEYW as compared to that available on the two full power stations licensed to Key West, see Complaint ¶¶ 12-18, which would be decidedly inconsistent with the Supreme Court's reliance on content neutrality as a basis for upholding must carry for full power broadcasters. See Turner I, 512 U.S. at 644; see also Turner Broad. Sys., Inc. v. FCC, 520 U.S. 180, 217-218 (1997).

⁸ See, e.g., Complaint of Washington County Television, Inc. against DR Partners, d/b/a Donrey Cablevision, 10 FCC Rcd. 3766, ¶ 3 (1995)(emphasis added).

II. CONCLUSION

For the foregoing reasons, Comcast respectfully requests that the Commission issue an order denying Bellizzi's must carry complaint, as WEYW plainly is not a "qualified" low power television broadcast station.

Respectfully submitted,

Comcast Cable Communications, LLC on behalf of its subsidiaries and affiliates

Brian A. Rankin Catherine Fox COMCAST CORPORATION One Comcast Center Philadelphia, PA 19103-2838 (215) 286-5237

November 8, 2013

Wesley R. Heppler Steven J. Horvitz

Frederick W. Giroux

DAVIS WRIGHT TREMAINE LLP 1919 Pennsylvania Avenue, N.W. Suite 800

Washington, D.C. 20006 (202) 973-4200

Its Attorneys

CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the foregoing Opposition to Complaint, and to the best of my knowledge, information and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and is not interposed for any improper purpose.

Respectfully submitted,

Comcast Cable Communications, LLC on behalf of its subsidiaries and affiliates

By:

Frederick W. Giroux

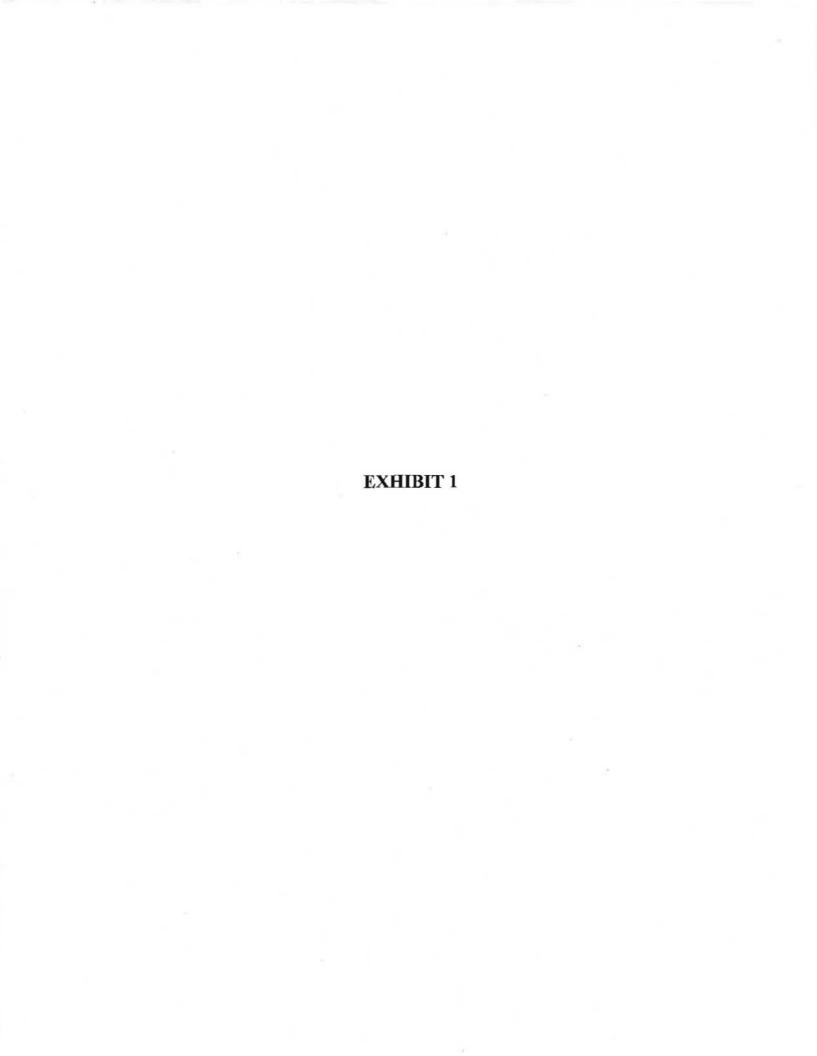
Davis Wright Tremaine LLP

1919 Pennsylvania Avenue, N.W., Suite 800 Washington, DC 20006

(202) 973-4200

November 8, 2013

Its Attorney





Station Search Details

FCC> Media Bureau> MB-CDBS> CDBS Public Access> Station Search



Help site map

Station Search Details

Call Sign:

WGEN-TV

Facility Id:

27387

Primary Station Call Sign:

Community of License:

KEY WEST, FL

Service:

DT

Fac Type:

COMMERCIAL DIGITAL TV

Status:

LICENSED

Status Date:

03/07/2010

Frequency:

180

Channel:

8

Virtual Channel:

8

Digital Status:

Lic Expir:

02/01/2021

NTSC TSID:

608

DTV TSID:

609

Licensee:

MAPALE LLC

Address:

C/O BROOKS, PIERCE, ET. AL.

Address 2:

P.O. BOX 1800

City:

RALEIGH

State:

NC

Zip Code:

27602 -

Phone Number:

(919) 839-0300

Engineering Data

View Engineering Data
View Call Sign History

Call Sign History FRN History

View FRN History

Correspondence Folder

View Correspondence Folder

FCC Home

Search

<u>Updates</u>

E-Filing

<u>Initiatives</u>

For Consumers

Find People

Please send comments via standard mail to the Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, S.W., Washington, D.C., 20554. Questions can also be answered by calling the FCC's National Call Center, toll free, at 1-888-Call FCC (1-888-225-5322).

Federal Communications Commission 445 12th Street SW Washington, DC 20554 More FCC Contact Information...

Phone: 1-888-CALL-FCC (1-888-225-5322)

TTY: 1-888-TELL-FCC (1-888-835-5322)

Fax: 1-866-418-0232 E-mail: fccinfo@fcc.gov - Privacy Policy

- Website Policies & Notices

- Required Browser Plug-ins

Freedom of Information Act



Station Search Details

FCC > Media Bureau > MB-CDBS > CDBS Public Access > Station Search



Station Search Details

Call Sign:

WSBS-TV

Facility Id:

72053

Primary Station Call Sign:

Community of License:

KEY WEST, FL

Service:

DT

Fac Type:

COMMERCIAL DIGITAL TV

Status:

LICENSED

Status Date:

05/05/2009

Frequency:

60

Channel:

3

Virtual Channel:

22

Digital Status:

Lic Expir:

02/01/2013

NTSC TSID:

5002

DTV TSID:

5003

Licensee:

WSBS LICENSING, INC.

Address:

7007 NW 77TH AVE.

Address 2:

City:

MIAMI

State:

FL

Zip Code:

33166 -

Phone Number:

(305) 441-6901

Engineering Data

View Engineering Data

Call Sign History

View Call Sign History

FRN History

View FRN History

Correspondence Folder

View Correspondence Folder

FCC Home

Search

<u>Updates</u>

E-Filing

<u>Initiatives</u>

For Consumers

Find People

Please send comments via standard mail to the Federal Communications Commission, Consumer and Governmental Affairs Bureau, 445 12th Street, S.W., Washington, D.C., 20554. Questions can also be answered by calling the FCC's National Call Center, toll free, at 1-888-Call FCC (1-888-225-5322).

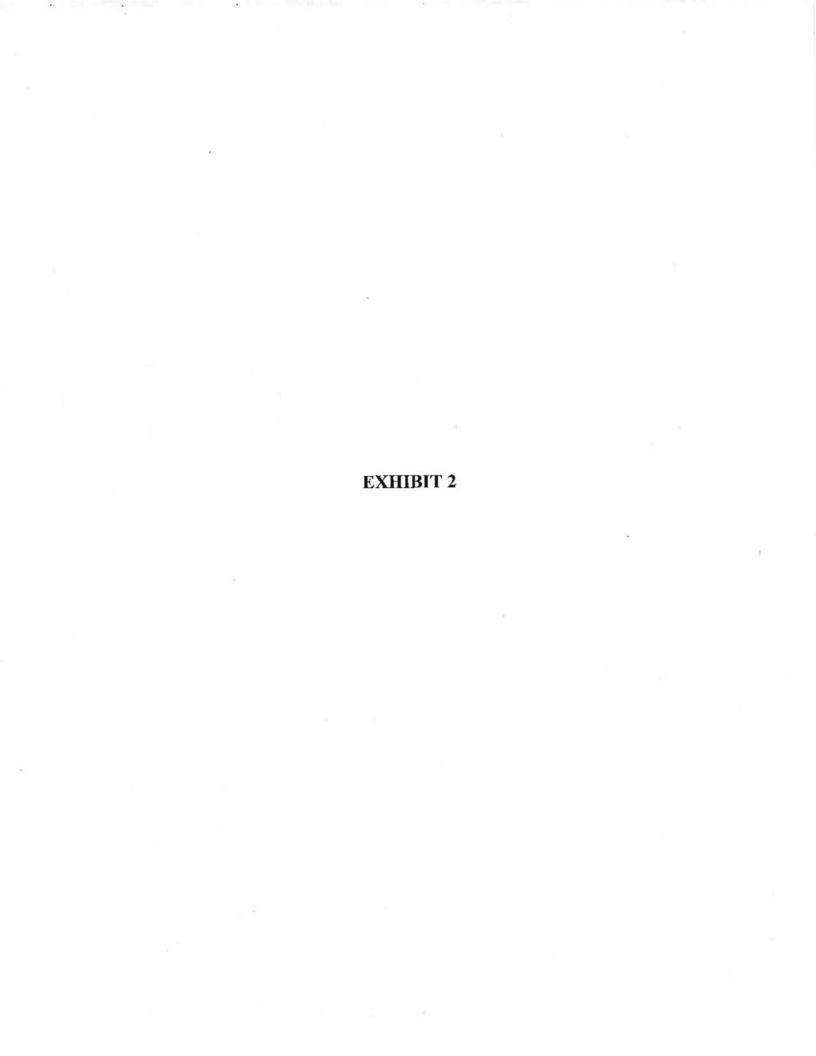
Federal Communications Commission 445 12th Street SW Washington, DC 20554 More FCC Contact Information... Phone: 1-888-CALL-FCC (1-888-225-5322)

TTY: 1-888-TELL-FCC (1-888-835-5322)

Fax: 1-866-418-0232 E-mail: fccinfo@fcc.gov - Privacy Policy

- Website Policies & Notices - Required Browser Plug-ins

- Freedom of Information Act



xfinity.

Channel Lineup

Effective: August 1, 2013



Connecting you to what's important in life.

Florida Keys

SYS/PRIN: 8495-6000 (0800 - 0880)



Channel Lineup

Effective August 1, 2013

SD = Standard Definition HD = High-Definition⁷

Includes the channels listed below. 201/604 V-ME (WPBT)			116211	W- 0111111010		
177 NEGUDE	- Silvens	MITEC	RASIC			
SD	Karan		LASIC	177		
SD	100000000000000000000000000000000000000	the ch	annels listed	201/604		V-ME (WPBT)
2 438 PBS (WPBT MIAM!) 210 LIVE WELL NATIONAL STATE PLANNEL 3 436 MYNETWORKTV (WBFS) 216 COZI (WTVJ) 5 KEYS 220/603 ESTRELLA TV (WSVN)				202		CREATE (WPBT)
MIAMI 210		1500-0		209		METV (WPLG)
3	2	438	SOLD SERVICE S	210		LIVE WELL
(WBFS) 216 COZI (WTVJ)		400	*			
1	3	436		040		
S	4	433	CBS (WFOR)	9.509/50		
INFORMATION STATION STATION STATION STATION STATION STATION STATION STATION STATION AMERICA AMERICA AMERICA AMERICA AMERICA AMERICA (WSFL.) COMMUNITY CHANNEL 225 ANTENNATY (WSFL.) CHANNEL 225 ANTENNATY (WSFL.) CHANNEL 229/607 EXITOS (WSCV) EX	5	10.5.2	KEYS	220/603		
5				004/005		
OCEAN REEF			STATION	224/605		
COMMUNITY CHANNEL COMMUNITY CHANNEL CHANNEL COMMUNITY CHANNEL	5		OCEAN REEF			
CHAINTEL (WSFL)				225		10.6
1				LLO		
7 434 FOX (WSVN) 229/607 EXITOS (WSCV) 8 445 MUNDOFOX (WGEN) 600 XFINITY LATINO 9 442 UNIVISION (WLTV) DIGITAL STARTER* 10 431 ABC (WPLG) Includes Limited Basic, Music Choice plus the channels listed below. 12 QVC Choice plus the channels listed below. 13 441 TELEMUNDO (WSCV) SD HD 14 C-SPAN 27 380 THE WEATHER CHANNEL 16 437 ION (WPXM) 28 423 CNN 17 487 PBS (WLRN			and the same of the same	226		AND CONTRACTOR OF THE PROPERTY
8 445 MUNDOFOX (WGEN) 600 XFINITY LATINO 9 442 UNIVISION (WLTV) DIGITAL STARTER¹ 10 431 ABC (WPLG) Includes Limited Basic, Music Choice plus the channels listed below. 12 QVC Choice plus the channels listed below. 13 441 TELEMUNDO (WSCV) SD HD 14 C-SPAN 27 380 THE WEATHER CHANNEL 16 437 ION (WPXM) 28 423 CNN 17 487 PBS (WLRN PBS) WISH 28 423 CNN 21 TBN (WHFT) 30 399 MSNBC 22 440 MEGA (WSBS) 31 470 CNBC 23 443 UNIMAS (WAMI) 32 428 FOX NEWS CHANNEL 24 KEY TV STANDER SPN SPN 26 HSN 34 403 ESPN 26 HSN 34 403 ESPN 26 HSN 34 403				229/607		
9	8	445				
10				000		M MITT E MINO
10	9	442	Control of the Contro	Section 1	TAL O	TA DEFEN
11	40	404		Die	FIIAL S	IARTER'
12			a reservation of the second	E I I	1.7. 9	100
13		435				
14			77.	Strong comments of the same		Cidines
14	13	441				
16	14			_		THE WEATHER
17		407		LI	000	
17				28	423	CNN
21 TBN (WHFT) 30 399 MSNBC 22 440 MEGA (WSBS) 31 470 CNBC 23 443 UNIMAS (WAMI) 32 428 FOX NEWS 24 KEY TV CHANNEL 25 439 WGN AMERICA 33/252 398 TRUTV 26 HSN 34 403 ESPN 46/186 SHOPNBC 35 404 ESPN2 76 GOVERNMENT 36 405 GOLF CHANNEL 77 GOVERNMENT ACCESS 37 448 NBC SPORTS 77 GOVERNMENT ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE	17	487			397	HLN
22 440 MEGA (WSBS) 31 470 CNBC 23 443 UNIMAS (WAMI) 32 428 FOX NEWS CHANNEL 24 KEY TV CHANNEL CHANNEL 25 439 WGN AMERICA 33/252 398 TRUTV 26 HSN 34 403 ESPN 26 HSN 35 404 ESPN2 46/186 SHOPNBC 35 404 ESPN2 76 GOVERNMENT ACCESS 37 448 NBC SPORTS NETWORK 77 GOVERNMENT ACCESS 38 402 SUN SPORTS NETWORK 77 OCEAN REEF OCLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL ALL 41 451 FX ACCESS ALL 407 TNT (MONROE COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE	21		-C			
23		440	200-2000 M	G050	10.00	
24 KEY TV 33/252 398 TRUTV 25 439 WGN AMERICA 33/252 398 TRUTV 26 HSN 34 403 ESPN 46/186 SHOPNBC 35 404 ESPN2 76 GOVERNMENT 36 405 GOLF CHANNEL ACCESS 37 448 NBC SPORTS NETWORK 77 GOVERNMENT ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE						
25 439 WGN AMERICA 33/252 398 TRUTV 26 HSN 34 403 ESPN 46/186 SHOPNBC 35 404 ESPN2 76 GOVERNMENT 36 405 GOLF CHANNEL ACCESS 37 448 NBC SPORTS 77 GOVERNMENT ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE		443		0L	420	
26 HSN 34 403 ESPN 46/186 SHOPNBC 35 404 ESPN2 76 GOVERNMENT 36 405 GOLF CHANNEL ACCESS 37 448 NBC SPORTS NETWORK ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 44 452 SPIKE		400	MONTH OF THE RESIDENCE	33/252	398	- Property of
46/186 SHOPNBC 35 404 ESPN2 46/186 SHOPNBC 35 405 GOLF CHANNEL ACCESS 37 448 NBC SPORTS NETWORK ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 42 407 TNT (MONROE COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE		439	10.30.00.00.00.00.00.00.00	F 60 - 4	8 8 8	
76 GOVERNMENT 36 405 GOLF CHANNEL ACCESS 37 448 NBC SPORTS NETWORK NETWORK 77 GOVERNMENT ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS (MONROE COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE						
ACCESS 37			ter care represent	0.50.50		
77 GOVERNMENT ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE	76					
77 ACCESS 38 402 SUN SPORTS 77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE	77			01	440	
77 OCEAN REEF 39 401 FS FLORIDA CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE	//			38	402	
CLUB CHANNEL 40 FOX DEPORTES 78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 43 421 TBS 87 RETRO TV 44 452 SPIKE	77			10.00		
78 EDUCATIONAL 41 451 FX ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 44 452 SPIKE 87 RETRO TV 44 452 SPIKE	11					
ACCESS 42 407 TNT (MONROE 43 421 TBS COUNTY) 44 452 SPIKE 87 RETRO TV 44 450 NICA	78				451	
(MONROE 42 407 THS COUNTY) 43 421 TBS SPIKE 87 RETRO TV 44 452 SPIKE	. •					
87 RETRO TV 44 452 SPIKE			(MONROE			
8/ RETROTY			COUNTY)			
(WEYW) 43 420 03A	87					
			(WEYW)	40	420	USA

47	429	AMC	732	450	FOX SPORTS 1
48		TV LAND		409	UNIVERSAL
49/188		JEWELRY TV		411	PALLADIA
50	382	NICKELODEON		412	VELOCITY
51	384	DISNEY		447	HSN .
		CHANNEL		471	QVC
52/124	381	CARTOON NETWORK		791	XFINITY 3D [®]
53	383	ABC FAMILY			
54	426	ANIMAL PLANET	DIG	ITAL P	REFERRED
55	424	DISCOVERY			
		CHANNEL			Starter, Music
56	425	TLC			channels
57	458	TRAVEL	listed be		
		CHANNEL	SD	HD ₀	WEATHERCOAN
58	457	E!	101		WEATHERSCAN
59/118	461	STYLE	107		AL JAZEERA AMERICA
60	414	FOOD NETWORK	108	408	NAT GEO WILD
61	415	HGTV	109	413	NATIONAL
62	459	LIFETIME	109	413	GEOGRAPHIC
63/277	486	CSS	110	446	SCIENCE
64	410	A&E	112	440	MILITARY
65/126	422	HISTORY	112		CHANNEL
66	430	BRAVO	113	466	DESTINATION
67	453	COMEDY			AMERICA
0.		CENTRAL	117	455	WE TV
68	427	SYFY	120		SOAPNET
70	473	MTV	121		DIY NETWORK
71	474	VH1	122		COOKING
72	475	BET			CHANNEL
74	378	GALAVISION	123		OXYGEN
103	0.0	OWN	129		NICK TOONS
105		C-SPAN3	130		THE HUB
106	469	FOX BUSINESS	131		NICK JR.
100	400	NETWORK	132		NICK 2
111	387	INVESTIGATION	133		TEENNICK
		DISCOVERY	134		ENCORE FAMILY
114	377	BBC AMERICA	135	385	DISNEY XD
115	464	BIO	136	000	DISNEY JUNIOR
116	388	H2	139		MTV HITS
119	465	LMN	140		MTV2
128		PBS KIDS	142		MTV JAMS
		SPROUT	143		VH1 CLASSIC
137	389	HALLMARK	144		VH1 SOUL
		CHANNEL	145		CMT PURE
146	476	CMT	140		COUNTRY
149		MOVIEPLEX	147		GAC
162	462	G4	148	454	FUSE
173	463	TV ONE	150	467	ENCORE
189	386	UP	152		ENCORE ACTION
239		JEWISH LIFE TV	154		ENCORE
243		EWTN	104		SUSPENSE
251	400	BLOOMBERG	156		ENCORE LOVE
256	468	HALLMARK	158		ENCORE DRAMA
		MOVIE CHANNEL	160		ENCORE
668		MUN2	,00		WESTERNS
728	392	FXX	163		LOGO

164	456	IFC	(Heller)
165		SUNDANCE	1
167		INDIEPLEX	
168		RETROPLEX	her and
169	395	TCM	Includ
170		FLIX	or ava
171		BBC WORLD NEWS	minim Also Ir
174		CENTRIC	SD
176		REELZ	120
179		GSN	259
182		DISCOVERY FIT	
		& HEALTH	279
241		DAYSTAR	621
245		PIVOT	000
246		BABYFIRST TV	638
		AMERICAS (ENGLISH)	716
247		THE WORD	717
241		NETWORK	<i>z</i> ,,,
255		OVATION	718
257		RLTV	
261		FAMILYNET	720
263		THE AFRICA	721
		CHANNEL	722
267		ASPIRE	723
279	479	MLB NETWORK	724
608		CNN EN	725
600		ESPAÑOL CANAL SUR	726
609 615		HISTORY EN	731
		ESPAÑOL	733
618		HITN	734/749
623		ESPN DEPORTES WAPA AMÉRICA	735
648 665	379	NUVO TV	736
667	3/8	TR3S	737
721		TVG	707
722	449	ESPNEWS	738
731	773	OUTDOOR	
701		CHANNEL	739
733	393	CBS SPORTS	742
		NETWORK	743
734/749	478	NBA TV	747
735	396	ESPNU	764
736	406	NFL NETWORK	766
739	477	NHL NETWORK	
	460	MGM	TO A POR

SPORTS ENTERTAINMENT PACK⁴

Included in Digital Premier or available a la carte with a minimum of Digital Starter. Also Includes Music Choice.

Also Incl	udes M	usic Choice,
SD	HD	
120		SOAPNET
259		FX MOVIE
		CHANNEL
279	479	MLB NETWORK
621		BEIN SPORT (ESPAÑOL)
638		BEIN SPORT
		(ENGLISH)
716		OUTSIDE TV
717		CRIME & INVESTIGATION
718		MILITARY
		HISTORY
720		HRTV
721		TVG
722	449	ESPNEWS
723		FCS ATLANTIC
724		FCS CENTRAL
725		FCS PACIFIC
726		ESPN CLASSIC
731		OUTDOOR CHANNEL
733	393	CBS SPORTS NETWORK
734/749	478	NBA TV
735	396	ESPNU
736	406	NFL NETWORK
737	394	TENNIS
131	334	CHANNEL
738		SPORTSMAN CHANNEL
739	477	NHL NETWORK
742	472	BTN
743	390	NFL REDZONE ⁵
747	391	WFN
764		PAC 12
766		ESPN
900 F.T.		GOAL LINE ¹²

DIGITAL PREMIER

Includes Digital Preferred with HBO", Cinemax", Showtime", Starz* and Sports Entertainment Pack.

MUSIC CHOICE²

801-846

MUSIC CHOICE

MARKET	Spill Street,	The second	-	CONTRACTOR IN
ONE	DEMA	NDT	UNE-	·INS"

	THE REAL PROPERTY.	
SD	HD	
1		ON DEMAND
166		FEARNET
298		FREE MOVIES
		ON DEMAND
299		HBO
		ON DEMAND
	530/	HD ON DEMAND
	557	EDEE LID MOVIEO
	531/ 558	FREE HD MOVIES ON DEMAND
	532/	HD PREMIUMS
	553	ON DEMAND
	533/	HD MUSIC
	554	ON DEMAND
534/		MOVIES
555		ON DEMAND
540		ADULT
		ON DEMAND
886		ENTERTAINMENT
		ON DEMAND
887		SHOPPING
		ON DEMAND
888/893		SEARCHLIGHT
		ON DEMAND
889		AUTOMOTIVE ON DEMAND
890		MYGOVERNMENT
090		ON DEMAND
892		JOBS BY
032		MONSTER
999		COMCAST
200		HELP VIDEOS

PREMIUM CHANNELS2,10

Included in select Digital TV Packages or available a la carte with a minimum of Limited Basic and a digital converter.

	нво*	
	WITH HBO*	
	ON DEMAND	
-		=

SD	HD	
302	301/	
	416	HB0
303	480	HB02
304	481	HBO SIGNATURE
305		HBO FAMILY
306		HBO COMEDY

307		HBO (W)
311	484	HBO ZONE
312	485	HBO LATINO

CINEMAX®
WITH CINEMAX
ON DEMAND

SD	HD	
320	319/	
	417	CINEMAX
321		MOREMAX
322		CINEMAX (W)
324		ACTIONMAX
325		THRILLERMAX
327		MOVIEMAX
328		MAX LATINO
329		5 STARMAX
330		OUTERMAX

SHOWTIME[®] WITH SHOWTIME[®] ON DEMAND

SD	HD	
335		SHO WOMEN
336		SHOWTIME FAMILY ZONE
337	8	SHO NEXT
340	339/	
	418	SHOWTIME
341	517	SH0 2
342		SHOWTIME
		SHOWCASE
347		SHO EXTREME

THE MOVIE CHANNEL[®] WITH THE MOVIE CHANNEL[®] ON DEMAND

SD	HD	
350	515	THE MOVIE
		CHANNEL
352		THE MOVIE
		CHANNEL XTRA

STARZ* WITH STARZ* ON DEMAND

15053000		
SD	HD	
370	369/	
	419	STARZ
371	497	STARZ EDGE
372		STARZ IN BLACK
373	496	STARZ KIDS
		& FAMILY
374		STARZ CINEMA
375	495	STARZ COMEDY

PLAYBOY® WITH PLAYBOY® ON DEMAND

SD	HD	
543		PLAYBOY TV
551		PLAYBOY TV EN ESPAÑOL

A LA CARTE SERVICES

DIGITAL ECONOMY

Includes Limited Basic plus the channels listed below. On Demand access is not included.

SD	HD			
27	380	THE WEATHER CHANNEL		
28	423	CNN		
32	428	FOX NEWS CHANNEL		
33/252	398	TRUTV		
45	420	USA		
47	429	AMC		
48		TV LAND		
49/188		JEWELRY TV		
51	384	DISNEY CHANNEL		
52/124	381	CARTOON NETWORK		
54	426	ANIMAL PLANET		
55	424	DISCOVERY CHANNEL		
58	457	E!		
60	414	FOOD NETWORK		
62	459	LIFETIME		
64	410	A&E		
65/126	422	HISTORY		
67	453	COMEDY CENTRAL		
72	475	BET		
116	388	H2		
137	389	HALLMARK CHANNEL		
241		DAYSTAR		
243		EWTN		
247		THE WORD NETWORK		
	447 471	HSN QVC		

FAMILY TIER®

SD	HD		
27		THE WEATHER	
		CHANNEL	

20	HLN
29	
51	DISNEY
	CHANNEL
60	FOOD NETWORK
61	HGTV
109	NATIONAL
	GEOGRAPHIC
110	SCIENCE
121	DIY NETWORK
128	PBS KIDS
	SPROUT
130	THE HUB
132	NICK2
133	TEENNICK
135	DISNEY XD

PAY-PER-VIEW²

COLUMN TWO IS NOT THE REAL PROPERTY.		
SD	HD	
501-503	509	IN DEMAND
		PAY-PER-VIEW
544		PLAYBOY TV
545		REAL+
546		XTSY
548		TEN+
549		PENTHOUSE+
550		JUICY
552		PLAYBOY TV
		EN ESPAÑOL

SPORTS PAY-PER-VIEW²

	THE PERSON NAMED IN COLUMN
HD	
	ESPN GAMEPLAN/ FULL COURT
760	NBA/MLS PAY-PER-VIEW
785-	
786	MLB/NHL PAY-PER-VIEW
	SUN SPORTS PAY-PER-VIEW
	760 785-

INTERNATIONAL SERVICES²

Available a la carte with a minimum of Limited Basic and a digital converter.

685	RTN (RUSSIAN)
686	CHANNEL ONE RUSSIA
687	RAI ITALIA (ITALIAN)
688	DEUTSCHE WELLE (GERMAN)
689	WILLOW PLUS (SOUTH ASIAN-HINDI)

690	SET ASIA (SOUTH ASIAN-HINDI)
691	ZEE TV (SOUTH ASIAN-HINDI)
692	STAR INDIA PLUS (SOUTH ASIAN-HINDI)
693	TV GLOBO (PORTUGUESE- BRAZILIAN)
694	PFC (PORTUGUESE- BRAZILIAN)
695	RECORD TV (BRAZILIAN)
696	BAND INTERNACIONAL (PORTUGUESE)
697	TV5MONDE (FRENCH)
698	THE ISRAELI NETWORK (HEBREW)

MultiLatino Lineup

Effective August 1, 2013

SD = Standard Definition/Definición Estándar HD = High-Definition/Alta Definición7

MULTILATINO²

648

649

WAPA AMÉRICA

TV DOMINICANA

Includ	ed in all I	MultiLatino	651		RITMOSON LATINO
47		kages or arte with a	652		CARACOL INTERNACIONAL
minim	um of Di	igital Starter,	653		TV COLOMBIA
Land Cart		-l	654		TV VENEZUELA
	do en toc etes Digit		655		TVE
		disponible a	000		INTERNACIONAL
		suscripción	656		ANTENA 3
minin	ia de Dig	iital Starter.	657		TELEFE
SD	HD				INTERNACIONAL
601	378	GALAVISION	658		TV CHILE
608		CNN EN ESPAÑOL	659		ECUAVISA
000		20111102	660		SUR PERU
609		CANAL SUR	661		CENTROAMERICA
613		DISCOVERY EN ESPAÑOL			TV
615		HISTORY EN	662		PASIONES
013		ESPAÑOL	665	379	NUVO TV
618		HITN	667		TR3S
619		MEXICANAL	668		MUN2
620		UTILISIMA	669		HTV MUSICA
621		BEIN SPORT	670		TELEHIT
02.		(ESPAÑOL)	675		LAS
622		FOX DEPORTES	676		UNIMAS (OESTE)
623		ESPN DEPORTES	677		UNIVISION
625		TELEMUNDO	678		(OESTE) DE PELICULA
		(OESTE)	679		DE PELICULA
631		DISCOVERY	0/9		CLASICO
	54.1	FAMILIA	680		CINE MEXICANO
632		V-ME KIDS	681		CINELATINO
633		TYC SPORTS	682		VIENDOMOVIES
634		EWTN EN ESPAÑOL	683		GRAN CINE
635		LA FAMILIA	000		GIT III GITE
636		ENLACE TBN	MI	ILTH AT	INO PLUS ²
030		USA	Pit	JEHLMI	INO PLOS
639		CANAL 52MX	Includ	es Limite	ed Basic
640		VIDEO ROLA			below, Music
641		ONCE TV MEXICO	Choice chann		ultil_atino
642		MULTIMEDIOS			
643 TELEFORMULA		Incluye los canales de Limited Basic, Music Choice			
645 BABYFIRST TV				Music Choice IultiLatino.	
	AMERICAS		y Carra		CHULLETEH ICA
		(ESPAÑOL)	2	HD 438	PBS (WPB1
647		BANDAMAX	_	700	MIAMI)

3	436	MYNETWORKTV (WBFS)	226 229/607		THIS TV (WSFL) EXITOS (WSCV)		
4	433	CBS (WFOR)	600		XFINITY LATINO		
5		KEYS INFORMATION STATION	MUL	TILATI	NO EXTRA ²		
5		OCEAN REEF COMMUNITY CHANNEL			l Economy below, Music		
6	432	NBC (WTVJ)	Choice	plus Mu	ultiLatino		
7	434	FOX (WSVN)	channe				
8	445	MUNDOFOX (WGEN)	Access is not included.				
9	442	UNIVISION (WLTV)	Incluye los canales de Digital Economy, Music Choice y canales de MultiLatino.				
10	431	ABC (WPLG)			eso a On		
11	435	THE CW (WSFL)	Deman				
12		QVC	SD	HD			
13	441	TELEMUNDO (WSCV)	27	380	THE WEATHER CHANNEL		
14		C-SPAN	28	423	CNN		
16 17	437 487	ION (WPXM) PBS (WLRN	32	428	FOX NEWS CHANNEL		
		MIAMI)	33/252	398	TRUTV		
21		TBN (WHFT)	45	420	USA		
22	440	MEGA (WSBS)	47	429	AMC		
23	443	UNIMAS (WAMI)	48		TV LAND		
24		KEY TV	49/188		JEWELRY TV		
25	439	WGN AMERICA	51	384	DISNEY		
26		HSN			CHANNEL		
46/186		SHOPNBC	52/124	381	CARTOON		
76		GOVERNMENT		400	NETWORK		
		ACCESS	54	426	ANIMAL PLANET		
77		GOVERNMENT ACCESS	55	424	DISCOVERY CHANNEL		
77		OCEAN REEF	58	457	E!		
		CLUB CHANNEL	60	414	FOOD NETWORK		
78		EDUCATIONAL ACCESS	62	459	LIFETIME		
		(MONROE	64	410	A&E		
		COUNTY)	65/126	422	HISTORY		
87		19 RTV (WEYW)	67	453	COMEDY CENTRAL		
104		C-SPAN2	72	475	BET		
177		TV GUIDE	116	388	H2		
		NETWORK	137	389	HALLMARK		
201/604		V-ME (WPBT)	101	550	CHANNEL		
202		CREATE (WPBT)	241		DAYSTAR		
209		METV (WPLG)	243		EWTN		
210		LIVE WELL NETWORK (WPLG)	247		THE WORD NETWORK		
216		COZI (WTVJ)		447	HSN		
220/603		ESTRELLA TV (WSVN)		471	QVC		
224/605		AZTECA AMERICA (WSFL)					
225		ANTENNA TV (WSFL)					

MU	LTILAT	TINO MAX2	122		COOKING CHANNEL	721 722	449	TVG ESPNEWS	2 A	Requ Addit
			123		OXYGEN	731	440	OUTDOOR		ıdditi
		atino Extra,	129		NICK TOONS	751		CHANNEL	3 R	sequ Digita
Music Choice plus the		130		THE HUB	733	393	CBS SPORTS	4 R	Requ	
channels listed below.		131		NICK JR.		•••	NETWORK)igita inter	
hachne	Multil	otion Extra	132		NICK 2	734/749	478	NBA TV		VFL F
Incluye MultiLatino Extra, Music Choice y los canales a		133		TEENNICK	735	396	ESPNU		fterr	
continu		y 100 car taces or	134		ENCORE FAMILY	736	406	NFL NETWORK		lurin egul
SD	HD		135	385	DISNEY XD	739	477	NHL NETWORK		waila
34	403	ESPN	136	000	DISNEY JUNIOR		460	MGM		o re
35	404	ESPN2	139		MTV HITS					V (n
36	405	GOLF CHANNEL	140		MTV2					evel
37	448	NBC SPORTS	142		MTV JAMS					equi
		NETWORK	143		VH1 CLASSIC					Requ Digita
38	402	SUN SPORTS	144		VH1 SOUL				а	HD/
39	401	FS FLORIDA	145		CMT PURE					onne
42	407	TNT	110		COUNTRY					harç
43	421	TBS	147		GAC				9 R	Requ
44	452	SPIKE	148	454	FUSE				10 H	o Dig
50	382	NICKELODEON	150	467	ENCORE					ubs
56	425	TLC	152		ENCORE ACTION					ervi
63/277	486	CSS	154		ENCORE				11 D	ongita Service
66	430	BRAVO			SUSPENSE				П	nay a
68	427	SYFY	156		ENCORE LOVE					Adap
70	473	MTV	158		ENCORE DRAMA					Tier F Subje
71	474	VH1	160		ENCORE				0	of pu
114	377	BBC AMERICA			WESTERNS					nay i
119	465	LMN	163		LOG0					SOME
128		PBS KIDS	164	456	IFC				12 E	SPN
		SPROUT	165		SUNDANCE					≈12: jame
-		THE RESIDENCE OF THE PARTY OF T	167		INDIEPLEX					egul
MUL	TILATI	NO ULTRA ²	168		RETROPLEX					
	SOUTH CITY		169	395	TCM				Prog subje	
Include	s Multil	atino Max,	170		FLIX				avail	
		ed channels	171		BBC WORLD				Basic level	
listed below, plus Music		121-225		NEWS				may		
Choice.	,		174		CENTRIC				inclu	ıding
Immlericas	: Multil :	atino Max, los	176		REELZ				servi a cor	
		ital Preferred	179		GSN				certa	
	: Choice		182		DISCOVERY FIT				servi	
SD	HD		044		& HEALTH				or su	
101	,,,,	WEATHERSCAN	241		DAYSTAR				avail	
107		AL JAZEERA	245		PIVOT				level	
		AMERICA	246		BABYFIRST TV AMERICAS				to Co	
108	408	NAT GEO WILD			(ENGLISH)				for re	estri
109	413	NATIONAL	247		THE WORD				All Tr	
		GEOGRAPHIC			NETWORK				respe right:	
110	446	SCIENCE	255		OVATION				119.10	
112		MILITARY	257		RLTV					
	46-	CHANNEL	261		FAMILYNET					
113	466	DESTINATION	263		THE AFRICA					
117	AFF	AMERICA			CHANNEL					
117	455	WETV	267		ASPIRE					
120		SOAPNET	070							

- Requires subscription to Limited Basic.
- Additional equipment may be required; additional service charges may apply.
- 3 Requires minimum level subscription to Digital Starter.
- 4 Requires minimum level of subscription to Digital Starter to subscribe to the Sports Entertainment Pack.
- 5 NFL RedZone airs live on Sunday afternoons (≈11:30am to ≈8:00pm) during football games throughout the NFL regular season.
- 6 Available only with Limited Basic.
- 7 To receive channels offered in HD, a HD TV (not provided), HDTV equipment and subscription to the channel's service level or underlying premium service are required.
- 8 Requires minimum level subscription to Digital Starter, as well as a full HD 3D TV, a HD/3D capable set top box, HDMI cable connection and 3D glasses. Comcast 3D authorization required. Additional service charges may apply.
- Requires minimum level of subscription to Digital Preferred.
- 10 HD Premlum Service. Requires subscription to individual premium service.
- 11 Digital device is required to receive this service and additional service charges may apply. Not available on Digital Adapters, Digital Economy or Family Tier Packages. On Demand selections subject to charge indicated at the time of purchase. On Demand services may require certain levels of service or subscription to premium channels for some programming.
- 12 ESPN Goal Line airs Saturdays (≈12:00pm to ≈12:00am) during football games throughout the NCAA Football regular season.

mming, services and features are t to change. Not all services are ole in all areas. Subscription to Limited Service is required to receive any other video service. Additional equipment e required to receive certain services ing, but not limited to, Premium es. Customer must purchase or rent verter for a separate charge to receive services including Family Tier. HD may require certain levels of service scription to premium channels for programming. Certain services are ole separately or as part of another service. Comcast service is subject ncast's standard terms and conditions rice. Call Comcast at 1-800-XFINITY trictions and complete details. demarks are the property of their ctive owners. @2013 Comcast. All reserved.

DIY NETWORK

279

667

479

MLB NETWORK

TR3S

120

121

CERTIFICATE OF SERVICE

I, Elinor McCormick, do hereby certify on this 8th day of November, 2013 that a true and correct copy of the foregoing "Opposition to Complaint" has been sent via U.S. mail, postage prepaid to the following:

William Lake, Chief, Media Bureau Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Barbara Kreisman, Esq. Chief, Video Division, Media Bureau Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Florida Department of State Cable and/or Video Franchising Division of Corporations Clifton Building 2661 Executive Center Circle Tallahassee, Florida 32301

Florida Department of Agriculture and Consumer Services Division of Consumer Services Terry Lee Rhodes Building 2005 Apalachee Parkway Tallahassee, FL 32399-6500

Monroe County Administrator's Office 1100 Simonton Street Suite 205 Key West, FL 33040

Lee J. Peltzman Shainis & Peltzman, Chartered 1850 M Street, N.W., Suite 240 Washington, D.C. 20036

Elinor McCormick